

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF PENNSYLVANIA**

William Keisling	:	No. 1:09-CV-2181
Plaintiff	:	
	:	Civil Action Law
v.	:	
	:	Honorable John E. Jones, III
Judge Richard Renn et al.	:	
Defendant	:	Electronically Filed

**DEFENDANTS COUNTY OF YORK AND PAMELA S. LEE'S RESPONSE  
TO PLAINTIFF'S OBJECTIONS**

Defendants York County and Lee first note that Plaintiff's Objections do not even address the substance of the recommendations of Magistrate Smyser with regard to York County and Lee. On Page 12 of the Objections, Plaintiff notes that he requires discovery against Lee. No mention is made of why discovery would assist him in his claims against York County.

At the very least, Plaintiff has waived his claims against the County. Defendant Lee submits that the claims against her are likewise waived. Plaintiff's Objections fail to meet the substance of Magistrate Judge Smyser's Recommendations. In fact, the Objections as they relate to Defendant Lee indicate a complete lack of understanding of the administrative role of the Prothonotary. The discovery requested by Plaintiff would do nothing to enable him to file a valid Second Amended Complaint against Lee.

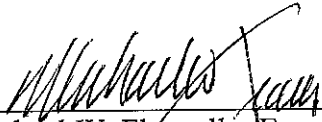
To the extent any additional response is necessary, Defendants County and Lee adopt the reasoning of Magistrate Judge Smyser on Pages 33-40 that Plaintiff failed to state a course of action against them. Magistrate Judge Smyser thoroughly sets forth the reasons why Plaintiff's Complaint is deficient as it relates to Defendants County and Lee.

Defendants Lee and County further note that Plaintiff's claims were not filed within the

applicable statute of limitations. (See Defendants Pamela S. Lee and County of York's Brief in Support of Second Motion to Dismiss). Furthermore, Lee is immune from the claims of Plaintiff. (Id.). Finally, Plaintiff's claims are barred by the Rooker-Feldman and Abstention Doctrine. (Id.).

Date:

3/30/2010

  
\_\_\_\_\_  
Michael W. Flannelly, Esquire  
Solicitor for the County of York  
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**CERTIFICATE OF SERVICE**

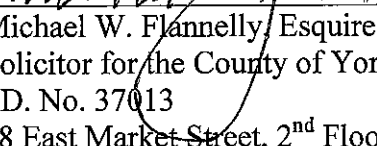
I, **Michael W. Flannelly**, Solicitor for the County of York, Pennsylvania, hereby certify that I have served a copy of the *Defendants County of York and Pamela S. Lee's Response to Plaintiff's Objections* to the following individuals this date:

William Keisling (via first-class mail)  
601 Kennedy Road  
Airville, PA 17302

Judge Richard Renn  
Judge John S. Kennedy  
Judge Sheryl Ann Dorney  
Judge Maria Musti Cook  
J. Robert Chuk  
York County Judicial District Court  
c/o Geri Romanello St. Joseph (via electronic means)  
Administrative Offices of PA Courts  
1515 Market Street, Suite 1414  
Philadelphia, PA 19102

Rick Lee  
Media News Group  
York Daily Record  
c/o Benn Law Firm (via electronic means)  
103 East Market Street  
York, PA 17401

Date: 3/30/2010

  
\_\_\_\_\_  
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